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January 9, 2019

BY ECF

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Centre Street
New York, NY 10007

Re: Franklin McKenzie v. City of New York, et al.
17 Civ. 4899 (PAE)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, the attorney assigned to represent defendants in the above-referenced matter. For the reasons set forth herein, defendant City of New York respectfully requests the Court's permission to file the following documents related to its Motion for Partial Summary Judgment, dated December 4, 2019 (see ECF No. 103), under seal:

1. Response to Plaintiff's Responsive Local Civil Rule 56.1 Statement
2. Reply Declaration of Bilal Haider
3. Exhibits O, P, and Q

A redacted version of these documents will be filed on ECF but not included in the courtesy copy of the motion papers which will be sent to the Court. Defendant City of New York has already served plaintiff with the unredacted copies of these documents. Plaintiff consents to this request.

The redactions contained in these documents are consistent with the Court's Order dated December 8, 2019. (See ECF No. 105.) Specifically, defendant City of New York has redacted only the names of non-party civilians in these documents. As such, defendant City of New York respectfully requests that the Court grant permission to file the unredacted versions of these documents under seal.

Unredacted copies of these documents with the proposed redactions highlighted will be delivered to the Court by e-mail for review. Thank you for your consideration herein.

Sincerely yours,

Bilal Haider /s

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cc: Ryan Lozar, Esq. (via ECF)
Counsel for plaintiff

The Court has reviewed the proposed redactions to defendants' response to plaintiff's Rule 56.1 statement, reply declaration of counsel, and exhibits O, P, and Q. The motion to file these items in redacted form, Dkt. 119, is granted. Counsel should file the unredacted documents under seal in accordance with this district's procedures.
SO ORDERED.

Paul A. Engelmayer

PAUL A. ENGELMAYER 1/10/2020
United States District Judge